

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

TRUSTEES OF THE CHICAGO PAINTERS AND)
DECORATORS PENSION FUND, TRUSTEES OF THE)
CHICAGO PAINTERS AND DECORATORS WELFARE)
FUND, TRUSTEES OF THE CHICAGO PAINTERS AND)
DECORATORS SAVINGS FUND, TRUSTEES OF THE)
CHICAGO PAINTERS AND DECORATORS)
APPRENTICESHIP FUND, TRUSTEES OF THE)
CHICAGO PAINTERS AND DECORATORS) Case No. 22-cv-2687
SCHOLARSHIP FUND, AND TRUSTEES OF THE)
CHICAGO PAINTERS AND DECORATORS)
JOINT COOPERATION TRUST FUNDS,) Judge Sharon Johnson Coleman
)
Plaintiffs,) Mag. Judge Beth W. Jantz
)
v.)
)
REGENCY GROUP OF ILLINOIS, INC., an Illinois)
corporation, and JOSEPH CAMPISI, Individually,)
)
Defendants.)

PLAINTIFF'S MOTION FOR JUDGMENT IN SUM CERTAIN

Plaintiffs, by and through their attorneys, DONALD D. SCHWARTZ, JAMES R. ANDERSON, BRIAN C. JAMES. GRANT R. PIECHOCINSKI and ARNOLD AND KADJAN, LLP, move this Court to enter an order for judgment in sum certain against Defendant REGENCY GROUP OF ILLINOIS, INC. In support of their Motion, the Plaintiffs state as follows:

1. This is an action to recover delinquent fringe benefit fund contributions which are due and owing based on Collective Bargaining Agreements, Declarations of Trust and provisions of ERISA.
2. The corporate Defendant was served with the Summons and Complaint on July 20, 2022 via the State of Illinois, Secretary of State.

3. This Court entered an order of Default against the Defendant on November 29, 2022 (Docket Entry 25).
4. Defendant owes the Plaintiffs \$187,239.90 as evidenced by a fringe benefit audit for the period of October 1, 2017 through September 30, 2022. This amount breaks down to \$124,590.09 in contributions; \$18,688.51 in liquidated damages on those contributions; \$31,793.51 in discrepancies (underpaid monthly contribution reports); \$9,647.79 in unpaid liquidated damages on monthly contribution reports that were not timely paid; and \$2,500.00 in audit costs. (Ex. A – Wolf Affidavit).
5. Defendant also owes a total of \$3,572.00 in attorneys fees and costs. (Ex. B – Piechocinski Declaration).
6. Therefore, Defendant, REGENCY GROUP OF ILLINOIS, INC. owes a total of \$190,811.90 in this matter.

WHEREFORE, Plaintiffs pray for the following relief:

- A. That this Court enter judgment in favor of the Plaintiffs and against the Defendant REGENCY GROUP OF ILLINOIS, INC. in the amount of \$190,811.90; and
- B. That this Court provide any such other or further relief it deems appropriate under the circumstances.

Respectfully submitted,

TRUSTEES OF THE CHICAGO PAINTERS, et al,

s/ Grant R. Piechocinski
One of their attorneys

DONALD D. SCHWARTZ
JAMES R. ANDERSON
GRANT R. PIECHOCINSKI
ARNOLD AND KADJAN LLP
35 East Wacker Drive, Suite 650
Chicago, Illinois 600601
(312) 236-0415

CERTIFICATE OF SERVICE
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I hereby certify that on the 5th day of April 2023, a copy of foregoing was filed electronically. Copies of this filing will be sent to below via U.S. Mail, first class, postage prepaid. Parties may access this filing through the Court's system.

Regency Group of Illinois, Inc.
c/o Joseph Campisi its registered agent
9400 Robinson Ave. Ste. B
Franklin Park, IL 60131

*/s/Grant R. Piechocinski
One of Plaintiffs' Attorneys*

DONALD D. SCHWARTZ
JAMES R. ANDERSON
GRANT R. PIECHOCINSKI
ARNOLD AND KADJAN LLP
35 East Wacker Drive, Suite 600
Chicago, Illinois 60601
(312) 236-0415